

2

(SPACE BELOW FOR FILING STAMP ONLY)

WALTER WILHELM LAW GROUP  
A Professional Corporation  
Riley C. Walter #91839  
Kathleen D. DeVaney #156444  
Danielle J. Bethel #315945  
205 East River Park Circle, Ste. 410  
Fresno, CA 93720  
Telephone: (559) 435-9800  
Facsimile: (559) 435-9868  
E-mail: [rileywalter@w2lg.com](mailto:rileywalter@w2lg.com)

Chapter 9 Counsel for Tulare Local Healthcare District

MCCORMICK BARSTOW, LLP  
Todd A. Wynkoop #308845  
Benjamin T. Nicholson #239893  
Benjamin E. Ladd #320466  
7647 N. Fresno Street  
Fresno, CA 93720  
Telephone: (559) 433-1300  
Facsimile: (559) 433-2300  
E-mail: [todd.wynkoop@mccormickbarstow.com](mailto:todd.wynkoop@mccormickbarstow.com)

District Counsel for Tulare Local Healthcare District

IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF CALIFORNIA  
FRESNO DIVISION

In re

TULARE LOCAL HEALTHCARE  
DISTRICT, dba TULARE  
REGIONAL MEDICAL CENTER,

Debtor.

Tax ID #: 94-6002897  
Address: 869 N. Cherry Street  
Tulare, CA 93274

CASE NO. 17-13797

DC No.: WW-44

Chapter 9

Date: September 13, 2018  
Time: 9:30 a.m.  
Place: 2500 Tulare Street  
Fresno, CA 93721  
Courtroom 13

Judge: Honorable René Lastreto II

**MOTION FOR ORDER AUTHORIZING REJECTION OF CERTAIN EXECUTORY  
CONTRACTS (GUPTA-KUMAR MEDICAL PRACTICE ASSOCIATES, INC., PARUL  
GUPTA, M.D.)**

TO THE HONORABLE RENÉ LASTRETO II, UNITED STATES BANKRUPTCY  
JUDGE:

1 Debtor, Tulare Local Healthcare District, doing business as Tulare Regional  
2 Medical Center ("Debtor" or the "District") hereby moves the Court, pursuant to 11  
3 U.S.C. § 365 and B.R. 6006, for entry of an order:

4 1. Authorizing the District to reject executory contracts<sup>1</sup> ("Designated  
5 Contracts") identified in Exhibit "A" ("Exhibit 'A'") of the annexed "Declaration of Sanford  
6 Haskins" ("Declaration"). Such rejection will be effective upon entry of an Order  
7 approving this Motion.

8 This Motion is based on the Motion, the Notice, Memorandum of Points and  
9 Authorities, the Declaration of Sanford Haskins in Support of the Motion, the files,  
10 pleadings and orders on file in this Chapter 9 case, and such other and further evidence  
11 as properly put before the Court.

12 **WHEREFORE**, the Debtor respectfully requests that the Court enter an order:  
13 (1) authorizing the rejection of the Designated Contracts; (2) fixing the date by which  
14 any claims based on this Motion must be filed; and (3) grant such other relief as is just  
15 and proper.

16 Dated: August 11, 2018

17 WALTER WILHELM LAW GROUP,  
a Professional Corporation

18  
19 By: 

20 Danielle J. Bethel  
21 Attorneys for Debtor Tulare Local Healthcare  
District, dba Tulare Regional Medical Center  
22  
23  
24  
25  
26  
27  
28

<sup>1</sup> The Designated Contracts include four (4) service agreements. While the District recognizes that the Designated Contracts may not constitute "executory contracts" within the meaning of 11 U.S.C. § 365, the District wishes to reject the Designated Contracts nonetheless out of an abundance of caution and for the avoidance of any doubt.